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From: <deborah.hoag@readingpa.org>

To: John Lovell/R3/USEPA/US@EPA

Copy To:

Delivered Date: 12/30/2008 10:42:57 AM

Subject: FW: Potential New Industry in Reading PA

John, Please read the below email. I didn't want you to be able to provide comments that were not taken as representing EPA as a whole or risk their being applied to another region not knowing how this issue is being handled. I have questions about the EPA position regarding the constituent discussed below particularly since it was mentioned. As we are progressing with the WWTP design, I am asking the gurus at B&V for their input so I feel somewhat certain there is not an adverse impact that way. I appreciate any insights you can provide as well. Thanks a bunch! Deb Deborah A.S. Hoag, P.E. Phone: 610-655-6258 Fax: 610-655-6034 Email: Deborah.Hoag@readingpa.org -----Original Message-----**From:** Deborah A. Hoag **Sent:** Tuesday, December 30, 2008 10:22 AM **To:** 'Scanlan, Patricia'; 'huntergl@bv.com'; 'Kobylinski, Edmund A. (Ed)' **Cc:** 'Hydro, Stephen K.' **Subject:** Potential New Industry in Reading PA Gary, Ed, and Trish, We have some active organizations working to pursue economic development in the Reading and Berks County area. Many times, I am contacted due to the potential wastewater impacts – volume, financial, or constituents. I received an inquiry this morning from a group working with a firm that is coming for additional visits to the former AT&T manufacturing facility. The facility was sold and part of it is currently used as the Expo Center which has little impact on wastewater especially compared to the prior use. I am not familiar with the parameter they are discussing and am concerned about the impact on the treatment process, receiving stream if it passes through unchanged, or the biosolids quality if it accumulates there. The potential firm is a manufacturer of solar cell components. In advance of their return trip, they wanted to raise a potential issue with obtaining a wastewater discharge permit because of a fluorosurfactant currently used in an etching process - Zonyl FSO-100, manufactured by DuPont. I have included portions of the email they originally sent to the site marketing organization. *It has recently come to our attention that Perfluorooctanoic Acid (PFOA), a precursor of FSO-100, has been the subject of numerous studies linking low level exposure to PFOA and increased risk of cancer in animals. In 2006, DuPont and the U.S. Environmental Protection Agency entered into a voluntary Stewardship Program to significantly reduce emissions of PFOA by 2010 and completely eliminate the manufacture, purchase, or use by 2015. As part of this program, DuPont will replace the Zonyl product line with the Capstone line by 2010. Even though PFOA and its derivatives and precursors are not specifically regulated by the EPA, some state and local regulatory jurisdictions have PFOA on their radar. Regulations may follow or already exist. As part of our due diligence in evaluating the [] site, we would like to understand any possible issues, if any, with obtaining a wastewater discharge permit in the event we are unable to find a substitute for FSO-100 before startup of our process tools. We thought we should raise this issue now, so that we could have this discussion with the environmental permitting authority when our team is on site.* In addition, they have also requested their supplier to find a replacement for FSO-100 before startup of their process tools. However, they are not aware of any replacement that would eliminate PFOA from the waste stream. I would appreciate any input and guidance you may have with this parameter and the potential impacts. I want to be fair to the potential industry while not jeopardizing the treatment plant. I have copied all of you as I am not certain of your schedules with the holidays and the desire to get some information prior to meeting with the industry in the next few weeks. Thanks in advance for your assistance. Deb Deborah A.S. Hoag, P.E. Utilities Division Manager City of Reading 815 Washington Street Reading, PA 19601-3690 Phone: 610-655-6258 Fax: 610-655-6034 Email:

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